

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5

IN THE MATTER OF:

Cleveland Energy Resources  
1801 East 12th Street, Suite 201  
Cleveland, Ohio 44114-3526

**ATTENTION:** Gerald Hoover, General Manager

**Request to Provide Information Pursuant to the Clean Air Act**

The United States Environmental Protection Agency (U.S. EPA) is requiring Cleveland Energy Resources (CER or you) to submit certain information about your Canal Road Steam Plant in Cleveland, Cuyahoga County, Ohio. Appendix A specifies the information that you must submit. You must send this information to us according to the schedule in Appendix A.

We are issuing this information request under section 114(a) of the Clean Air Act (Act), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of U.S. EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Air and Radiation Division, Region 5.

CER owns and operates an emission source at your Canal Road Steam Plant in Cleveland, Ohio. We are requesting this information to determine whether your emission source is complying with the Ohio State Implementation Plan.

You must send all required information to:

Attn: Compliance Tracker, AE-17J  
Air Enforcement and Compliance Assurance Branch  
U.S. Environmental Protection Agency  
Region 5  
77 West Jackson Boulevard  
Chicago, Illinois 60604

With copies to Ohio Environmental Protection Agency:

Robert Hodanbosi, Chief  
Division of Air Pollution Control  
Ohio Environmental Protection Agency  
Lazarus Government Center  
P.O. Box 1049  
Columbus, Ohio 43216-1049

Mark Vilem, Project Coordinator  
Department of Public Health & Welfare  
Division of the Environment  
1925 St. Clair Avenue  
Cleveland, Ohio 44114

You may consider the information confidential that you submit to us. You may assert a claim of business confidentiality for any portion of the submitted information, except emission data, under 40 C.F.R. part 2, subpart B. Information subject to a business confidentiality claim is available to the public only to the extent allowed under 40 C.F.R. part 2, subpart B. Failure to assert a business confidentiality claim makes all submitted information available to the public without further notice.

CER must submit all requested information under an authorized signature certifying that the information is true and

complete to the best knowledge of the certifying official after due inquiry. Knowingly providing false information, in response to this request, may be actionable under section 113(c)(2) of the Act, and 18 U.S.C. §§ 1001 and 1341.

We may use any information submitted in response to this request in an administrative, civil, or criminal action.

This request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 et seq., because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

Failure to comply fully with this request for information may subject CER to an enforcement action under section 113 of the Act, 42 U.S.C. § 7413.

You should direct any questions about this request for information to Greg Chomycia at (312)353-8217 any legal questions about this request should be directed to Assistant Regional Counsel John Matson at (312)886-2243.

                      
Date

Bharat Mathur  
Bharat Mathur, Director  
Air and Radiation Division

## APPENDIX A

**Re: Particulate Emission Test for boilers number 34, 35, and 37  
(Ohio EPA sources B001, B002, and B004).**

Stack testing shall be performed in accordance with U.S. EPA Methods 1-5, and 9, 40 C.F.R. Part 60, Appendix A. The stack test protocol shall include:

1. One stack test each on boiler numbers 34, 35, and 37, consisting of three runs, during which the boiler is operating at "maximum load" which shall be defined as the maximum design capacity or the maximum load which was practically achievable during the past 3 years, whichever is greater.
2. The stack testing shall be performed on each boiler after a period of at least four weeks of operating during which the boiler and associated air pollution control device have had no cleaning or rehabilitation performed (other than normal maintenance).
3. For each stack test, at least one of the three test runs shall be conducted during a normal sootblowing cycle which is consistent with the maximum frequency and duration normally experienced for the total testing period.
4. For each stack test, at least one of the three test runs shall be conducted during a normal ash pulling cycle which is consistent with the maximum frequency and duration normally experienced for the total testing period.
5. The boilers shall be operated under "normal operating procedures" which shall be defined as maintenance during daily usage of the boilers at maximum load. Operating parameters shall be recorded, including at a minimum:
  - a. heat input (million BTU/hr)
  - b. steam flow (lbs/hr)
  - b. steam temperature (°F)
  - c. steam pressure (psia)
  - d. combustion of air flow (lbs/hr)
  - e. soot blowing cycle
  - f. coal feed rate to boiler (ton/hr)
  - g. oxygen levels at boiler outlet
  - h. time recorded (start to finish)
6. Coal, representative of the "worse case coal" quality burned during normal operations, shall be utilized. Fuel sampling and analysis shall be performed and submitted on an as fired basis in accordance with ASTM procedures specified in 40

C.F.R. Part 60, Method 19, or as approved by the U.S. EPA. The "worst case coal" is defined for purposes of this test protocol to represent coal that is burned with a percent ash content greater than 8 percent by weight. The coal analysis shall include, at minimum: weight percent ash, weight percent sulfur, heat content, and percent fines.

7. Continuous opacity monitor strip charts for the day(s) of testing shall be submitted with the stack test report. These shall be dated, signed, and the time scale verified.
8. Visible emissions observations shall be performed by a certified observer in accordance with U.S. EPA Method 9, 40 C.F.R. Part 60, Appendix A, throughout the test period.
9. Any other emission test runs, conducted or attempted after receipt of this Request for Information shall be documented with results included therein.
10. Notification of particulate emission testing, including the maximum load at which the boiler will be tested, the scrap quality and coke quality to be utilized, and the scrubber parameters to be maintained, shall be sent to U.S. EPA and the Ohio Environmental Protection Agency at least 15 days prior to the test date. Personnel designated by these agencies shall be permitted to observe all testing, ask questions of testing personnel, and make whatever records of the testing such representatives deem necessary, including photographs.
11. Particulate emission testing shall be completed on boilers 34, 35, and 37 no later than 180 days after receipt of this request.
12. Results of all testing shall be submitted in a bound report to U.S. EPA, and the State of Ohio within 30 days after completion of testing. The report shall contain the results of testing (including raw data sheets and all filter and beaker weights), the reporting of all applicable operating parameters identified in paragraph 7, as well as information required in paragraphs 3-10 above.

CERTIFICATE OF MAILING

I, Loretta Shaffer, certify that I sent a Request to Provide Information Pursuant to the Clean Air Act by Certified Mail, Return Receipt Requested, to:

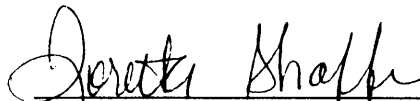
Gerald Hoover, General Manager  
Cleveland Energy Resources  
1801 East 12th Street, Suite 201  
Cleveland, Ohio 44114-3526

I also certify that I sent a copy of the Request to Provide Information Pursuant to the Clean Air Act by First Class Mail to:

Robert Hodanbosi, Chief  
Division of Air Pollution Control  
Ohio Environmental Protection Agency  
Lazarus Government Center  
P.O. Box 1049  
Columbus, Ohio 43216-1049

Mark Vilem, Project Coordinator  
Department of Public Health & Welfare  
Division of the Environment  
1925 St. Clair Avenue  
Cleveland, Ohio 44114

on the 7<sup>th</sup> day of November 2000.



Loretta Shaffer, Secretary  
AECAS (OH/MN) Section

# FACSIMILE REQUEST AND COVER SHEET



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
AIR AND RADIATION DIVISION  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

TO: Gerald Hoover

OF: Cleveland Energy Resources

PHONE #: \_\_\_\_\_ FAX#: 216 241-6486

FROM: Greg Chomycia

OF: Environmental Protection Agency

PHONE#: (312) 353-8217 FAX#: 312-353-8289

DATE: November 7, 2000 PAGES (including cover sheet): 8 pages

COMMENTS: \_\_\_\_\_

## TRANSMISSION REPORT

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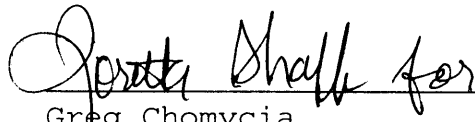
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PD : POLLED BY REMOTE SF : STORE & FORWARD RI : RELAY INITIATE RS : RELAY STATION  
MB : SEND TO MAILBOX PG : POLLING A REMOTE MP : MULTI-POLLING RM : RECEIVE TO MEMORY

Certified Mail Receipt Number: 70993400 0000 95932156  
CERTIFICATE OF FACSIMILE

I, Greg Chomycia, certify that I sent a Request to Provide  
Information Pursuant to the Clean Air Act by facsimile, to:

Gerald Hoover, General Manager  
Cleveland Energy Resources  
(216) 241-6486

at 9:00a on the 7<sup>th</sup> day of November 2000.

  
\_\_\_\_\_  
Greg Chomycia,  
Environmental Engineer  
AECAS (OH/MN)

FAX ID NUMBER: \_\_\_\_\_

JOB NUMBER: \_\_\_\_\_